



WATER & WASTEWATER
MUNICIPAL INFRASTRUCTURE
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TENTATIVE GENERAL ORDER FOR DAIRIES

Good afternoon Chairman Longley and Board Members. My name is Donald Ikemiya. I am a principal and Division Director of Natural Resources with Provost & Pritchard Engineering Group, out of our Visalia Office. I'm a registered civil and agricultural engineer. I am also a former NRCS Area Engineer and tired former weekend farmer.

As policy makers, you as Board Members have the daunting task of deciphering and implementing an unprecedented General Order for existing milk cow dairies. Balancing water quality objectives with achievable goals while keeping Central Valley dairies viable is definitely a challenge.

After numerous discussions with others in the dairy consulting field, many concerns were raised. A major question we ask ourselves is this: How are we going to be able to service our clients? I will briefly outline three of the most critical big picture concerns we have:

1. High Costs – for Minimal Benefit

As summarized in the dairy panel presentation and in the cost handout, the initial and ongoing annual costs as well as the tremendous workload required for compliance on 1,600 dairies in the region is excessive.

- \$89,000 for initial upfront costs and \$58,000 in annual costs. Again this does not include the cost of designing and constructing infrastructure improvements.
- For 1,600 dairies, that's over \$142 million dollars initially and \$93 million dollars on an annual basis.
- For just the upfront requirements a simple calculation to determine staffing hours at \$80/hr results in **856 staff years needed**. In other words, more than 850 consultants would be needed for one full year just to complete the initial up front requirements.

2. Availability of Qualified Engineers, Geologists and Agronomists with Dairy Experience.

- Retiring engineers, frustrated engineers, lack of trained engineers, and a lack of engineers willing to do this work reduces the availability of qualified professionals.
- We currently have more dairy regulatory work out there than we can service now, yet engineers aren't showing up to do this work. It's because they don't exist.
- Over the last 40 years only about 564 Agricultural Engineers have become licensed in the State of CA. Many of which are no longer practicing. I'm number 490 and John Schaap is 563. This point illustrates the fact that engineers that

understand the combination of biological systems and complex engineering concepts are scarce.

- We are aware of less than 10 consulting dairy engineers (Civil and Ag) in this Region, all of whom are already overworked.
- Last summer a meeting was held at the Fresno County Farm Bureau inviting all of the local dairy agronomists, engineers, geologists and agency staff. The list of those in attendance totaled 28.
- The NRCS list of Technical Service Providers is lacking adequate personnel.
- As written, the requirements are unattainable. Without appropriate modifications, it's hard to imagine how this General Order can be made to work.
- We are at great risk of missing critical deadlines due to the insufficient number of qualified personnel. It would be unfair to punish a dairy that cannot find a consultant to do their work in a timely manner.
- Some of you are probably asking yourselves, shouldn't I as an engineer be excited about all the work that this Order will generate for me? Answer – There's no integrity or professional satisfaction doing work that puts your client out of business because of its high cost and irrelevancy.

3. Beta Test Everything

Issues of relevancy, logistics and intensity must be resolved.

- **Relevancy** – e.g. is the lagoon 90% of the problem or 5% of the problem? Why spend money and resources on something that doesn't fix the problem?
- **Logistics** – large geographic area to service.
- **Intensity** - soil testing 40+ samples per field. Why so much?
- Need clarity - as you read through the Order the requirements are not concise. The basic structure of the Order is confusing and inconsistent. e.g. Table 1 Monitoring Parameters and the references to that table.
- What does a Waste Management Plan look like? NMP? MRP sampling reports? Salinity Report? Standard formats with protocols and procedures are needed. It will be easier to produce and easier for Regional Board staff to review.
- Will the Regional Board staff have the resources to provide timely review and comments?
- Have the implications of conflicting Air District and County regulations been assessed?

I urge the Board to direct staff to work together with dairy consultants to optimize the General Order. Why spend a dollar to solve a nickel problem? When, it is far better to leverage and focus that dollar to generate a ten-dollar benefit. It is easier to make the improvements to the Order now, before costly overextended requirements are implemented and it is a better use of time and resources to implement practices that work.

Thank you,


Donald Ikemiya, P.E.